

U.S. Department of Justice
Washington, D.C.

Criminal Docket
Presented in Corpus Christi

SEALED

Corpus Christi Division

Magistrate No.: N/A

File: INDICTMENT

Filed: March 11, 2020

County: Nueces

LIONS #: 2020R05872

CR. No.: **C-20-569**

JUDGE NELVA GONZALES RAMOS

Judge: _____

Attorneys: _____

United States of America

v.

RYAN K. PATRICK, U.S. ATTORNEY

MICHAEL E. HESS, ASST. U.S. ATTORNEY

GRAND JURY ACTION

APP'D RET

1) ROBERT MARTINEZ HINOJOSA,
AKA BIG ROB,

2) MATTHEW JOHN SAYLES,
AKA MATEO,
AKA MONEY MATT

3) RAUL BENAVIDES,
AKA JOKER,

4) GILBERTO SALDANA, JR.,
AKA DOE DOE,
AKA JERRY

5) JUAN LEBRADO PENA
AKA SLIM,

6) SERGIO LORENZO PENA,
AKA YOUNGSTER,
AKA BOY,

7) DANNY RAY MARTINEZ,
AKA RASKAL,

8) JOE DANIEL DAVILA,
AKA J.D.,

9) RAUL VALDEZ,
AKA PELON,

10) SERENITY LYNN MCCracken

PLEASE INITIAL

TRUE BILL: _____

NO BILL: _____

Charge(s): Ct. 1 (Defendants 1-5): Did knowingly and intentionally conspire while
employed by or associated with an enterprise engaged in activities which affect
interstate or foreign commerce, and did participate directly or indirectly in
conduct of the enterprise's affairs through a pattern of racketeering activity:
18 USC 1962(d).

Ct. 2 (Defendants 1-10): Did knowingly and intentionally conspire to possess with intent to distribute more than 1 kilogram of heroin, 5 kilograms of cocaine, 280 grams of cocaine base, and 500 grams of mixture or substance containing methamphetamine: 21 USC 846, 841(a)(1), and 841(b)(1)(A).

Penalty: Ct. 1 (Defendants 1- 5): Not more than life imprisonment without probation, parole, or a suspended sentence, and a fine of not more than \$250,000, or both; at least 3 years SRT; and, a \$100 Special Assessment.
Ct. 2 (Defendants 1-10): Not less than 10 years and not more than life imprisonment without probation, parole, or a suspended sentence, or a fine not to exceed \$10 million, or both; at least 5 years SRT; and a \$100 Special Assessment.

In Jail: Defendants 2 and 9
On Bond: _____
No Arrest: Arrest Warrants to be filed on Defendants 1, 3-8, 10